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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

AUG 04 2020

SEAN F. McAVOY, CLERK  
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SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRICE LEROY WOFFORD and  
ASHLEIGH IMAN STANFORD,

Defendants.

**2:20-CR-95-TOR**  
INDICTMENT

Vio: 21 U.S.C. § 841(a)(1), (b)(1)(C)  
and 18 U.S.C. § 2  
Possession with Intent to Distribute  
a Controlled Substance –  
Oxycodone Hydrochloride  
(Count 1)

21 U.S.C. § 841(a)(1), (b)(1)(C)  
and 18 U.S.C. § 2  
Possession with Intent to Distribute  
a Controlled Substance – Fentanyl  
(Count 2)

18 U.S.C. §§ 922(g)(1), 924(a)(2)  
Felon in Possession of a Firearm  
(Count 3)

18 U.S.C. § 924(d), 21 U.S.C.  
§ 853, 28 U.S.C. § 2461(c)  
Forfeiture Allegations:

1 The Grand Jury charges:

2 COUNT 1

3 On or about July 2, 2019, in the Eastern District of Washington, the  
4 Defendants, BRICE LEROY WOFFORD and ASHLEIGH IMAN STANFORD, did  
5 knowingly and intentionally possess with the intent to distribute a mixture or  
6 substance containing a detectable amount of Oxycodone Hydrochloride, a Schedule  
7 II controlled substance, all in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18  
8 U.S.C. § 2.  
9  
10

11 COUNT 2

12 On or about July 2, 2019, in the Eastern District of Washington, the  
13 Defendants, BRICE LEROY WOFFORD and ASHLEIGH IMAN STANFORD,  
14 did knowingly and intentionally possess with the intent to distribute a mixture or  
15 substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-  
16 piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled substance, all in  
17 violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18 U.S.C. § 2.  
18  
19  
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21 COUNT 3

22 On or about July 2, 2019, in the Eastern District of Washington, the Defendant,  
23 BRICE LEROY WOFFORD, knowing of his status as a person previously  
24 convicted of a crime punishable by imprisonment for a term exceeding one year,  
25 did knowingly possess in and affecting commerce, firearms, to wit: a Taurus, .357  
26  
27  
28

1 Magnum revolver, bearing serial number UA82071; and a Caspian Arms/Tussey  
2 Custom, .380 caliber semi-automatic pistol, bearing serial number 31679,  
3  
4 which firearms had theretofore been shipped and transported in interstate and  
5 foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).  
6

### 7 NOTICE OF CRIMINAL FORFEITURE

8 The allegations contained in this Indictment are hereby re-alleged and  
9  
10 incorporated by reference for the purpose of alleging forfeitures.

11 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of  
12 21 U.S.C. § 841 as set forth in Counts 1 and 2 of this Indictment, the Defendants,  
13  
14 BRICE LEROY WOFFORD and ASHLEIGH IMAN STANFORD, shall forfeit to the  
15 United States of America, any property constituting, or derived from, any proceeds  
16  
17 obtained, directly or indirectly, as the result of such offense and any property used or  
18 intended to be used, in any manner or part, to commit or to facilitate the commission of  
19  
20 the offense.

21 If any of the property described above, as a result of any act or omission of  
22  
23 the Defendant:

- 24 a. cannot be located upon the exercise of due diligence;
- 25 b. has been transferred or sold to, or deposited with, a third party;
- 26 c. has been placed beyond the jurisdiction of the court;
- 27 d. has been substantially diminished in value; or
- 28

1 e. has been commingled with other property that cannot be divided  
2 without difficulty;  
3 the United States of America shall be entitled to forfeiture of substitute property  
4 pursuant to 21 U.S.C. § 853(p).  
5

6 Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction of  
7 an offense in violation of 18 U.S.C. § 922, as set forth in Count 3 of this  
8 Indictment, the Defendant, BRICE LEROY WOFFORD, shall forfeit to the United  
9 States of America, any firearms and ammunition involved or used in the  
10 commission of the offense.  
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13 DATED this 14<sup>th</sup> day of August, 2020.  
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22 William D. Hyslop  
23 United States Attorney

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26 Patrick J. Cashman  
27 Assistant United States Attorney  
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